

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to: *All Consolidated Amended Complaint (ECF No. 3463) Cases*

**NOTICE OF PLAINTIFFS' MOTION PURSUANT TO FED. R. CIV. P. 54(b)
AND THE COURT'S INHERENT POWERS TO REVISE THIS COURT'S
MARCH 28, 2018 ORDER (ECF NO. 3946)**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the prior proceedings and pleadings in this litigation, Plaintiffs who have asserted claims against the Kingdom of Saudi Arabia (“Kingdom”) through the Plaintiffs’ Executive Committees’ Consolidated Amended Complaint at ECF No. 3463 (“CAC”), respectfully move this Court pursuant to Fed. R. Civ. P. 54(b) and this Court’s inherent powers, to give effect to the recent decisions of *Kaplan v. Lebanese Canadian Bank*, 999 F.3d 842 (2d Cir. 2021) (“*Kaplan*”), and *Honickman v. BLOM Bank SAL*, 6 F.4th 487 (2d Cir. 2021) (“*Honickman*”), and enter orders superseding and revising its March 28, 2018 Memorandum Decision and Order at ECF No. 3946, insofar as that Order rejected Plaintiffs’ arguments that this Court possesses jurisdiction over Plaintiffs’ statutory and common law secondary and primary liability claims against the Kingdom.

Dated: December 7, 2021

Respectfully submitted,

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On behalf of the CAC Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Notice of Plaintiffs' Motion Pursuant to Fed. R. Civ. P. 54(b) and the Court's Inherent Powers to Revise This Court's March 28, 2018 Order (ECF No. 3946), was electronically filed this 7th day of December 2021. Notice of this filing will be served upon all parties in 03 MDL 1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system.



J. Scott Tarbutton, Esq.